

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-CR- 80219-RLR

UNITED STATES OF AMERICA

v.

MICHAEL GORDON DOUGLAS,
a/k/a “DaddyBreedsFam,”
a/k/a “Michael,”

Defendant.

GOVERNMENT'S FIFTH RESPONSE TO STANDING DISCOVERY ORDER

The United States hereby files this fifth response to the Standing Discovery Order. This response also complies with Local Rule 88.10 and Federal Rule of Criminal Procedure 16.

- A. 5. Books, papers, documents, data, photographs, tangible objects, buildings or places, within the government's possession, custody or control, which are material to the preparation of the defendant's defense, or which the government intends to use as evidence at trial to prove its case in chief, or which were obtained from or belong to the defendant, may be inspected at a mutually convenient time at: the Office of the United States Attorney, 500 A. Australian Ave., West Palm Beach, Florida, Suite 400. Please call the undersigned within 48 hours if you intent to review the evidence to set up a date and time that is convenient to both parties.

The attachments to this discovery response are not necessarily copies of all the books, papers, documents, data, etc., that the government may intend to introduce at trial.

- B. **DEMAND FOR RECIPROCAL DISCOVERY:** Pursuant to the Standing Discovery Order, the United States requests the disclosure and production of materials listed in Section (b) of Local Rule 88.10. This request is also made pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure.

The government is aware of its continuing duty to disclose such newly discovered additional information required by the Standing Discovery Order, Rule 16(c) of the Federal Rules of Criminal Procedure, *Brady*, *Giglio*, *Napue*, and the obligation to assure a fair trial.

The following folders and files were uploaded to USAfX in a folder entitled “Outbound Discovery_RSD05 (Douglas)” and made available via secured link to defense counsel:

1. LI002 Verizon Orbic Contacts-Chats-Emails-Ims
 - a. Reliance Communications_RC608L_2023-12-27_Report_2025-04-02_Report
2. LI002 Verizon Orbic Sanitized CSAM Report
 - a. Report
3. LI009 Samsung Contacts-Chats-Emails-Ims
 - a. Google Android_Full File system_2023-12-29_Report_2025-04-02_Report
4. LI009 Samsung Galaxy Sanitized CSAM Report
 - a. Report

Please contact the undersigned Assistant United States Attorney if any pages are missing.

Respectfully submitted,

HAYDEN P. O’BYRNE
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 2, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record on the attached Service List in the manner specified.

s/Justin Chapman
Justin Chapman
Assistant United States Attorney